

FILED-CLERK  
DISTRICT COURT  
IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION  
OCT 28 AM 11:36  
EASTERN-MARSHALL

BY: \_\_\_\_\_

XIAOHUA HUANG, AN INDIVIDUAL )  
Plaintiff, )  
 ) Case No.: 2:15-cv-01413 JRG/RSP  
v. )  
 ) DEMAND FOR JURY TRIAL  
HUAWEI TECHNOLOGIES CO. LTD. )  
Defendant. )

**PLAINTIFF XIAOHUA HUANG'S FOURTH MOTION TO COMPEL  
"THE NECESSARY INFORMATION FOR DISCOVERY" PRODUCTION**

In response to the court order on July 27, 2016 (Dkt. No. 93), Plaintiff Xiaohua Huang hired three independent experts. The three experts signed "UNDERTAKING OF EXPERTS OR CONSULTANTS REGARDING PROTECTIVE ORDER" which were filed in Dkt. No. 111 and Dkt. No. 112.

The Plaintiff filed many motion to compel and asked Defendant many time to get the materials for Discovery.

The Plaintiff respectfully moves the Court to compel Defendant to make the files below ( not limited to) available for the experts of Plaintiff to get and analyze.

1. Huawei has the burden to prove that no Huawei's products containing the seven model HiSilicon ASIC chips containing the TCAM IP of eSilicon Corporation have been sold in the United States, and Huawei need to provide the information including:
  - (1) The model numbers of those seven HiSilicon ASIC chips containing the TCAM IP of eSilicon Corporation. The time and date in which those seven

HiSilicon ASIC chips were first time fabricated.

- (2) The model numbers of Huawei's products containing those seven HiSilicon ASIC chips containing the TCAM IP of eSilicon Corporation. The time and date in which those Huawei's products containing those seven HiSilicon ASIC chips were first time fabricated.
- (3) The manufacture process (such as 40nm, 28nm .. etc) of those seven HiSilicon ASIC chips containing the TCAM IP of eSilicon Corporation.
- (4) The Lists of Huawei's products sold in the United States in the past five years.
- (5) The Specification, data sheets, Netlist and GDSII of the TCAM IP used in those seven chips.
- (6) The Contract which Huawei (HiSilicon) signed with eSilicon Corporation to licensed the eFlaxCAM, the files transferred to Huawei from eSilicon.

2. The specification and datasheet of NSE 5512, the time that NSE 5512 was first on market, The schematic, GDSII and spice netlist of NSE 5512.

Huawei should not be permitted to further delay "the necessary information for Discovery" production. Accordingly, Plaintiff Xiaohua Huang respectfully requests the Court to compel Huawei to provide "the necessary information for Discovery" listed above.

Dated: October 27, 2016

Respectfully Submitted,



Xiaohua Huang

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Exhibit 1 the proposed court order

Exhibit 2 email to Huawei for discovery

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served on all counsel and parties who have consented to electronic service on this 27 day of October, 2016 pursuant to Local Rule CV- 5(a)(3)(A).

Xiaohua Huang

